



November 17, 2004

Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 – 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

***Re: WT Docket No. 01-309  
HAC Digital Wireless Telephones***

**Second Semi-Annual Report - 2004**

Dear Ms. Dortch:

The Filer, Whidbey Telephone Company, is the licensee of Station KNLG248 (F Block – Aberdeen, Washington BTA) and Station KNLG517 (D Block – Port Angeles, Washington BTA) in the Broadband Personal Communications Service. This report is submitted pursuant to the requirements of Paragraph Nos. 89 – 91 of the Commission's *Report and Order* (WT Docket No. 01-309), FCC 03-168, released August 14, 2003 ("R&O").

By way of background, the Filer is a small, Tier III Commercial Mobile Radio Service licensee, as defined in the Commission's E-911 *Order to Stay*, FCC 02-210, released July 26, 2002. The Filer's broadband PCS systems employ a GSM air interface. Because the Filer offers two or fewer digital wireless handsets in the U.S., it qualifies for the *de minimis* exception to the Hearing Aid Compatibility ("HAC") rules, described in Rule Section 20.19 (e)(1).

Should you have any questions, please contact John Prendergast or Cary Mitchell of the law firm of Blooston, Mordkofsky, Dickens, Duffy & Prendergast. Either may be reached by calling (202) 659-0830.

Respectfully submitted,

**WHIDBEY TELEPHONE COMPANY**

Marion F. Henny  
President